

UNITED STATES DISTRICT COURT  
MIDDLE DISTRICT OF NORTH CAROLINA  
GREENSBORO DIVISION

JONATHAN R. BURRS,

Plaintiff,

v.

UNITED TECHNOLOGIES  
CORPORATION, and WALTER KIDDE  
PORTABLE EQUIPMENT, INC.,

Defendant.

Case No. 1:18-cv-00491-CCE-LPA

**DECLARATION OF THOMAS G. REYNOLDS IV**

1. I, Thomas G. Reynolds IV, am over eighteen (18) years of age and am legally competent to give this Declaration, which is freely and voluntarily given. The facts contained herein are based on my own personal knowledge.

2. I am an attorney with the law firm of Seyfarth Shaw LLP, 1075 Peachtree Street, N.E., Suite 2500, Atlanta, Georgia, 30309-3958, and I am one of the attorneys representing Defendants United Technologies Corporation and Walter Kidde Portable Equipment, Inc. in this action.

3. Defendants incurred legal fees and expenses in connection with defending Plaintiff's present lawsuit.

4. The services Seyfarth Shaw, LLP rendered in defending Plaintiff's lawsuit included, inter alia: (a) investigating and analyzing Plaintiff's claims in his Complaint and Amended Complaint; (b) researching, drafting, and revising Defendants' Motion to

Dismiss Plaintiff's Complaint; (c) researching, drafting, and revising Defendants' Motion for Sanctions as to Plaintiff's Complaint; (d) investigating and analyzing Plaintiff's Motion to Transfer Venue; (e) researching, drafting, and revising Defendants' opposition to Plaintiff's Motion to Transfer Venue; (f) researching, drafting, and revising Defendants' Motion for Sanctions as to Plaintiff's Motion to Transfer Venue; and (g) corresponding with Plaintiff regarding his Complaint and Motion to Transfer Venue and Defendants' motions for sanctions as to each of those filings.

5. The table below summarizes the attorney time incurred and fees billed to Defendants in providing these services (true and correct copies of each of the invoices listed are attached to this declaration as Exhibits A-E):

<b>Invoice</b>	<b>Date</b>	<b>Hours</b>	<b>Fees</b>
3048168	07/16/2018	3.30	\$907.50
3070378	08/10/2018	18.30	\$5,342.50
3118347	10/23/2018	Costs	\$52.08
3129244	10/31/2018	70.60	\$19,787.00
3144131	11/21/2018	19.90	\$5,627.50
<b>TOTAL</b>		<b>112.10</b>	<b>\$31,716.58</b>

6. Seyfarth Shaw, LLC billed Defendants a total sum of \$31,716.58 for fees and costs incurred in defending Plaintiff's present lawsuit.

7. The fees and costs described above were necessary and reasonably incurred in connection with Defendants' defense of Plaintiff's present lawsuit, and the hourly rates are reasonable and consistent with rates charged by other lawyers in the Atlanta metropolitan area for similar services.

I declare pursuant to 28 U.S.C. § 1746, under penalty of perjury, that the foregoing is true and correct.

Executed this 1st day of February, 2019.



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Thomas G. Reynolds IV